

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***RESPONSE TO COMMENTS***

ON THE TITLE V DRAFT PERMIT V-03-004 R2

DARAMIC, LLC

5525 U.S. 60 EAST, OWENSBORO, KY 42303

JULY 18, 2006

IL-WON SHIN, REVIEWER

SOURCE I.D. #:	021-059-00006
SOURCE A.I. #:	894
ACTIVITY #:	APE20060002 AND APE20050003

**SOURCE DESCRIPTION:**

Daramic, LLC located at Owensboro, Kentucky, manufactures polyethylene battery separators through five main processes: receiving and handling of bulk materials, mixing of bulk materials, extrusion of the mixture, extraction of oil from the polyethylene web, and finishing by application of fiberglass mat to the polyethylene web and/or slitting/chopping.

Bulk materials are received by railcar, bags, and by drums. Dry materials received by railcar are pneumatically conveyed from the railcar into three main storage silos, one for polyethylene and two for silica. The railcar unloader uses an induced draft fan to move the product from the railcar into a cyclone and baghouse unit to recover the product. These materials are then pneumatically conveyed into the storage silos. Silo 1 is equipped with a baghouse to prevent product from escaping. Silo 2 & 3 share a baghouse.

Daramic uses three boilers to provide both space heat and process heat. Two small boilers (22.3 and 26.8 mmBtu/hr respectively) are used to provide space heat during the 5 cold months of the year. The main boiler (63 mmBtu/hr) is used to provide process heat for Daramic and Owensboro Specialty Polymers (previously WR Grace). All boilers are natural gas fired with the capability of burning number 2 fuel oil as a backup. Operation of these boilers on #2 Fuel Oil is used as a last resort in maintaining production operations.

Recently Daramic purchased the Fibermark, Inc. facility located at the same physical location. This purchase included the Cleaver Brooks 900 hp Boiler. This boiler was previously permitted by Fibermark and operated under Permit # S-99-115. Daramic submitted a construction application for permitting of a 900 hp Boiler and addition of insignificant activities on May 11, 2006.

**PUBLIC AND U.S. EPA REVIEW:**

On June 9, 2006, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in Owensboro, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from Daramic, LLC on June 23, 2006. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit. The U.S. EPA has 45 days to comment on this proposed permit.

# ATTACHMENT A

## Response to Comments

Comments on Daramic, LLC Draft Title V Air Quality Permit submitted by Sean T. Lane, EHS Manager.

### **Title V Permit**

1. Page 30, Group 11 – T-854 should not be listed in this section, but should be considered insignificant. This tank serves the same purpose as tanks 850, 851, 500, 710, and 852 which are all considered insignificant.

*Division's response: The Division has revised the permit as requested by the source.*

2. Page 36, Insignificant Activities – (EP 52) (ED 139) is described as “One Single-wide DGRE Finishing Line.” This contains a typo and should read “One Single-wide DGRF Finishing Line.”

*Division's response: The Division has revised the permit as requested by the source.*

### **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.